

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF ILLINOIS

BIGY MASHAKU;
CHRISTINE MUHOZA,

Plaintiff,

Civil Action No. 1:24-cv-12321

v.

ALEJANDRO MAYORKAS, in his
official capacity, Secretary, U.S.
Department of Homeland Security, *et al.*,

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION TO TRANSFER VENUE TO THE
DISTRICT OF MAINE**

Plaintiffs Bigy Mashaku and Christine Muhoza filed a Complaint pursuant to the Administrative Procedure Act (“APA”) and Immigration and Nationality Act (“INA”) requesting that the Court order the U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate Plaintiff Mashaku’s Form I-589, Application for Asylum and Withholding. For the reasons stated herein, Plaintiffs respectfully request that this Court, pursuant to 28 U.S.C. § 1404(a), transfer this case to the District of Maine. On January 20, 2025, undersigned counsel was informed that Plaintiff is not a resident of Hendricks County, Indiana, but rather resides in Cumberland County, Maine. Accordingly, the Boston Asylum Office holds jurisdiction over Plaintiff Mashaku’s Application.

1. Plaintiffs filed the instant action on November 27, 2024, in the Northern District of Illinois, based on Plaintiff Mashaku’s stated residence being in Hendricks County, Indiana.

2. On January 20, 2025, undersigned counsel received an email from the U.S. Attorney's Office for the Northern District of Illinois, informing her that USCIS had scheduled Plaintiffs for an interview with the Chicago Asylum Office on February 10, 2025.
3. However, USCIS has since canceled the scheduled interview with the Chicago Asylum Office upon determining that Plaintiff Mashaku's Form I-589 falls under the jurisdiction of the Boston Asylum Office due to the residence of Plaintiff Mashaku and Plaintiff Muhoza in Maine. Consequently, the Northern District of Illinois is no longer a proper venue for this case.
4. At the time the complaint was filed, this information was not available to the undersigned counsel.
5. Plaintiffs are residents of Cumberland County, Maine, making the District of Maine a proper and convenient venue pursuant to 28 U.S.C. § 1391.
6. Plaintiffs' counsel has been informed that Defendants do not oppose the transfer of this case to the District of Maine. Plaintiffs contend that the convenience of the parties and witnesses, as well as the interests of justice, would be served by transferring the case to the District of Maine.
7. Transferring this case to the District of Maine will accommodate the convenience of the Plaintiffs, who reside there. Such a transfer aligns with principles of judicial economy and fairness. Additionally, it ensures the case is heard in a forum directly connected to the Plaintiffs' residence and within the jurisdiction of the Asylum Office responsible for the adjudication of Plaintiff Mashaku's Application.

8. For the reasons stated above, Plaintiffs respectfully request that the Court grant this motion and issue an order transferring this case from the Northern District of Illinois to the District of Maine, where it may be properly adjudicated.
9. Plaintiffs affirm that this transfer will not unfairly prejudice the government or cause undue delay in the resolution of this case. Additionally, the Plaintiffs assert that this motion is not made for any improper purpose or to achieve any unfair advantage. The intent behind this transfer is solely to facilitate the efficient administration of justice and the convenience of the parties.

WHEREFORE, the Plaintiffs respectfully request that the Court grant this Unopposed Motion to Transfer Venue and enter an order transferring the above-captioned case to the United States District Court for the District of Maine.

Date: January 20, 2025

Respectfully Submitted,

/s/ Sadaf F. Ahmedd
Sadaf F. Ahmed, Esq. (3668749)
JEELANI LAW FIRM, PLC
3701 W. Algonquin Road, Ste. 630
Rolling Meadows, IL 60008
sadaf@jeelani-law.com
Phone:(312) 767-9030
Fax:(312) 767-9030
Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF ILLINOIS

BIGY MASHAKU;
CHRISTINE MUHOZA,

Plaintiff,

v.

ALEJANDRO MAYORKAS, in his
official capacity, Secretary, U.S.
Department of Homeland Security, *et al.*,

Defendants.

Civil Action No. 1:24-cv-12321

ORDER

Upon consideration of the Unopposed Motion to Transfer Venue to the District of Maine, any opposition thereto, and the entire record herein, it is hereby
ORDERED that Plaintiffs' Unopposed Motion is **GRANTED**.

Dated: _____

HON. SARA L. ELLIS
UNITED STATES DISTRICT JUDGE